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December 23, 2024

Via CM/ECF

United States District Court Southern District of New York Honorable Judge Barbara Moses Daniel Patrick Moynihan United States Courthouse 500 Pearl St. New York, NY 10007-1312

RE: Barron et al. v. micromobility et al., Case No. 1:20-cv-4703

Dear Judge Moses:

Counsel on both sides have been diligently working together to find a date that works for all parties to attend a settlement conference as ordered by the Court via email on December 19th. However, due to the number of parties in this case—more than a dozen named plaintiffs and defendants—counsel has not yet been able to identify three days when all parties are available.

Counsel jointly request, therefore, a short extension to December 30th, 2024 to provide the Court with available dates for the settlement conference. Additionally, to facilitate scheduling, we jointly request that the Court permit: 1) some of the parties appear remotely provided that all counsel appear in person; and 2) Plaintiffs to be represented at the conference by three of the fifteen named plaintiffs listed on the Amended Complaint.

Thank you for your time in this matter and we look forward to a productive settlement conference.

RESPECTFULLY SUBMITTED ON BEHALF OF ALL PARTIES,

s/ Michael Kanovitz
Michael Kanovitz (pro hac vice)
Jon Loevy (pro hac vice)
Julia Rickert (pro hac vice)
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cc: All parties via CM/ECF